

REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant response. Claims 1-26 remain pending in the case. Claims 1-26 are rejected. Claim 26 is cancelled herein without prejudice. Claims 1, 7, 10, 16 and 20-22 are amended herein. No new matter has been added.

35 U.S.C. §102(e)

Claims 7-9, 20 and 21 stand rejected under 35 U.S.C. §102(e) as being anticipated by United States Patent Application Publication 2002/0059131 A1 by Goodwin et al., hereinafter referred to as the "Goodwin" reference. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 7-9, 20 and 21 are not anticipated by Goodwin in view of the following rationale.

Applicant respectfully directs the Examiner to independent Claim 7 that recites that an embodiment of the present invention is directed to (emphasis added):

A method of offering a product for sale based on customer selected conditions, comprising the steps of:

displaying a plurality of conditions corresponding to the product to the customer, wherein the conditions are customer selectable;

receiving a set of conditions selected by the customer;

storing the set of conditions in a memory;

monitoring the memory to determine whether the conditions can be met, wherein when the conditions are met, the

customer may be contacted and offered the product for sale; and provided the conditions are met, proactively establishing a telephonic connection with the customer.

Independent Claims 20 and 21 recite similar limitations. Claims 8 and 9 that depend from independent Claim 7 provide further recitations of features of the invention.

Goodwin and these embodiments of the claimed invention are very different. Applicant understands Goodwin to teach a method for trading and originating financial products using a computer network. In particular, Goodwin teaches a method for wherein financial product information is provided to a potential buyer without establishing a telephonic connection. The financial product information is provided to a user over a network connection in the form of textual documentation. In general, Applicants understand Goodwin to teach a method for providing textual documentation of user selected financial product information over a computer network.

In contrast, embodiments of the claimed invention are directed towards a method of offering a product for sale based on customer selected conditions over a telephone connection. In particular, once a set of customer selected conditions are met, a telephonic connection is proactively established with the customer. As described in the present specification, a human representative may make a telephone call to a customer, providing for proactive interaction

with the customer (page 17, lines 5-22).

Applicants understand Goodwin to teach a method for trading financial products by presenting information over a computer network. As described in Goodwin, the information is presented in a textual or graphical format over the computer network. In contrast, the claimed embodiments of the invention provide a method of offering a product for sale by establishing a telephonic connection with the customer. By communicating over a telephone, a human representative may provide a customer with product information and details, while also offering the ability to answer particular questions and addressing concerns of the customer. Furthermore, many customers prefer human interaction when purchasing products.

Furthermore, Applicants respectfully assert that Goodwin does not proactively present financial product information. Specifically, Goodwin presents financial information in response to a user request (0132). Due to the nature of network communications, information can be presented nearly instantaneously with respect to the user. Computer networks can transmit information at very fast speeds, and are only constrained by the amount of bandwidth of the network, and resources are relatively inexpensive. Thus, a user can select information by interacting with a specific listing, and the financial products service can present information in response to the request. Since there is no time delay in presenting the information, and the information

is presented directly in response to a user request, there is not proactive presentation of financial product information.

In contrast, embodiments of the present invention provide for proactively establishing a telephonic connection with the customer. Due to the nature of telephone communications, human call center agents are required to handle telephone calls. Since humans are in limited quantity, customers are often required to be placed on hold when requesting product information. To alleviate the need for customers to call and be placed on hold, embodiments of the present invention proactively establish a telephonic connection with a user. As opposed to network communications, providing human interaction may require a delay time between the request and the connection. By proactively establishing a telephonic connection, the customer is not required to remain on hold during any delay time.

Applicants respectfully assert that Goodwin in particular does not teach, disclose, or suggest a method wherein a telephonic connection with a customer is proactively established, as claimed. In contrast, Goodwin discloses a method for trading financial products by presenting information concerning the products over a computer network. In particular, the financial product information is presented in the form of textual or graphical information for display on a computer screen or display device connected to the computer network.

Applicant respectfully asserts that nowhere does Goodwin teach, disclose or suggest the present invention as recited in independent Claims 7, 20 and 21, and that this claimed subject matter is thus in a condition for allowance. Therefore, Applicant respectfully submits that Goodwin also does not teach or suggest the additional claimed features of the present invention as recited in Claims 8 and 9 dependant on allowable base Claim 7. Therefore, Applicant respectfully submits that Claims 8 and 9 overcome the rejection under 35 U.S.C. § 102(e), and are in a condition for allowance as being dependent on allowable base claims.

35 U.S.C. §103(a)

Claims 1-6, 10-19 and 22-25 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodwin in view of United States Patent Application Publication 2002/0087680 A1 by Cerami et al., hereinafter referred to as the "Cerami" reference. Applicants have reviewed the cited reference and respectfully submit that the present invention as recited in Claims 1-6, 10-19 and 22-25 is not anticipated nor rendered obvious by Goodwin in view of Cerami.

Applicants respectfully direct the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

A method of addressing problems associated with customer orders, comprising the steps of:
receiving an order placed by a customer;
initiating a workflow process to handle the order;
monitoring the workflow process to detect any problems;
notifying a call center agent if a problem occurs during the processing of the order which enables the call center agent to proactively contact the customer; and
proactively establishing a telephonic connection with the customer in response to the problem.

Independent Claims 10, 16 and 22 recite similar limitations. Claims 2-6 that depend from independent Claim 1, Claims 11-15 that depend from independent Claim 10, Claims 17-19 that depend from independent Claim 16, and Claims 23-25 that depend from independent Claim 22 provide further recitations of the features of the present invention.

The combination of Goodwin and Cerami does not teach a method of addressing problems associated with customer orders comprising proactively establishing a telephonic connection with the customer in response to a problem as claimed. As described above, Goodwin and the claimed invention are very different. Applicant understands Goodwin to teach a method for trading financial products over a computer network. In particular, information pertaining to the financial products is presented in a textual or graphical format on a display device connected to the computer network. In contrast, embodiments of the claimed invention are directed towards proactively establishing a telephone connection with the customer in response to the problem.

Applicants respectfully assert that embodiments of the present invention, as claimed, are directed towards a method of addressing problems associated with customer orders comprising proactively establishing a telephonic connection with the customer in response to a problem. As pointed out by Examiner Borissov, Goodwin does not teach, describe or suggest notifying a call center agent in response to a problem during the processing of an order. In contrast, Goodwin presents financial product information in response to a request of a potential customer.

Furthermore, as described above, Applicants respectfully assert that Goodwin does not proactively present the financial product information. Specifically, Goodwin presents financial information in response to a user request (0132). Due to the nature of network communications, information can be presented nearly instantaneously with respect to the user. Computer networks can transmit information at very fast speeds, and are only constrained by the amount of bandwidth of the network, and resources are relatively inexpensive. Thus, a user can select information by interacting with a specific listing, and the financial products service can present information in response to the request. Since there is no time delay in presenting the information, and the information is presented directly in response to a user request, there is not proactive presentation of financial product information.

In contrast, embodiments of the present invention provide for proactively establishing a telephonic connection with the customer in response to a problem. Due to the nature of telephone communications, human call center agents are required to handle telephone calls. Since humans are in limited quantity, customers are often required to be placed on hold when inquiring as to a problem in placing an order. To alleviate the need for customers to call and be placed on hold, embodiments of the present invention proactively establish a telephonic connection with a user once a problem is detected. As opposed to network communications, providing human interaction may require a delay time between the detection of the problem and the connection. By proactively establishing a telephonic connection, the customer is not required to remain on hold during any delay time once the problem has been detected.

Moreover, the combination of Goodwin and Cerami fails to teach or suggest this claim limitation because Cerami does not overcome the shortcomings of Goodwin. Cerami, alone or in combination with Goodwin, does not show or suggest a method of addressing problems associated with customer orders comprising proactively establishing a telephonic connection with the customer in response to a problem as claimed.

Applicant understands Cerami to teach a method of managing a repair process for a fault between a proactive network repair system and a customer service system using a repair ticketing system. In particular, the ticketing

system notifies customer service representatives about a fault in the network so that the customer service representatives can “report known fault problems and repair efforts to customers when they call in” (emphasis added).

In contrast, embodiments of the present invention are directed towards proactively establishing a telephone connection with a customer in response to a problem. Cerami does not teach, disclose, or suggest proactively establishing a telephonic connection with a customer in response to the problem, as claimed. On the contrary, Cerami teaches away from such a configuration, as Cerami provides fault information to a customer upon receiving a telephone call. In view of the claim limitation of establishing a telephonic connection with a customer in response to the problem not being shown or suggested in Cerami, in combination with the above arguments, Applicants respectfully submit that independent Claims 1, 10, 16 and 22 overcome the cited references and are therefore allowable over the combination of Goodwin and Cerami.

Applicants respectfully assert that nowhere does the combination of Goodwin and Cerami teach, disclose or suggest the present invention as recited in independent Claims 1, 10, 16 and 22, and that these claims are thus in condition for allowance. Therefore, Applicant respectfully submits the combination of Goodwin and Cerami also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2-6

dependant on allowable base Claim 1, Claims 11-15 dependant on allowable base Claim 10, Claims 17-19 dependant on allowable base Claim 16, and Claims 23-25 dependant on allowable base Claim 22. Applicants respectfully submit that Claims 2-6, 11-15, 17-19 and 23-25 overcome the rejection under 35 U.S.C. § 103(a) as these claims are dependent on allowable base claims.

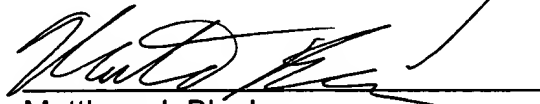
CONCLUSION

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-25 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,
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